

REMARKS**Claim Rejections – 35 U.S.C. § 102**

The Examiner has rejected claims 1-40 under 35 U.S.C. §102(b), as being anticipated by Cai et al (U.S. Patent No. 6,349,363) (“Cai”). For the reasons set forth below, Applicant asserts that the cited references fail to anticipate Applicant’s invention as claimed in claims 1-40.

Cai discloses a system including multiple program execution entities and a cache memory having multiple sections. (Cai abstract) Additionally, Cai discloses a technique where the cache controller selects one of the P-caches based on a comparison of the EID provided by a request and the EID values stored in the storage elements. (Cai column 5, lines 56-59)

With respect to independent claim 1 in the presently claimed invention, Applicant teaches and claims:

“A method, comprising partitioning a cache array into one or more special-purpose entries and one or more general-purpose entries, wherein special-purpose entries are only allocated for one or more streams having a particular stream ID, wherein the stream ID is stored outside the cache array, determining if a cross-access scenario exists between at least one of the one or more special purpose entries and at least one of the one or more general purpose entries, and if the cross-access scenario exists, permitting cross-access of data between the at least one of the one or more special-purpose entries and the at least

one of the one or more general-purpose entries that relate to the cross-access scenario.” (Claim 1) (Emphasis added)

Applicant asserts that Cai does not anticipate Applicant’s invention as claimed in claim 1 because the system in Cai does not teach determining if a cross-access scenario exists between a special purpose entry and a general purpose entry and, additionally, does not teach permitting cross-access between at least one special purpose entry and at least one general purpose entry. In the office action mailed by Examiner on October 3, 2006 the Examiner equates a single sentence in the Cai patent as anticipating all of the claimed limitations as emphasized above, specifically “[i]n addition, other cache related signals such as snoop signals may be provided to the cache controller.” (Cai, column 6, lines 17-19) Applicant respectfully disagrees with this assessment.

The ability to snoop commonly refers to the ability for a cache to look at transactions on a bus to determine if the cache stores that information. Again, snooping is in reference to a cache specifically looking at transactions on a bus. This is entirely dissimilar to Applicant’s claimed invention which teaches logic determining if a cross-access scenario is present between more than one cache entry and, if so, permitting the cross-access of data between entries. Contrary to the Examiner’s assertion, Applicant believes that in no way does the statement “other cache related signals such as snoop signal may be provided to the cache controller” explicitly or inherently suggest the emphasized claim limitations in claim 1. Thus, Applicant respectfully submits that Cai does not anticipate Applicant’s invention as claimed in pending independent claim 1.

In regard to independent claims 7, 13, 19, 25, and 30, Applicant respectfully submits that Cai does not anticipate Applicant’s invention at least for the same reasons as

independent claim 1. Again, Cai does not teach at least determining if a cross-access scenario exists between a special purpose entry and a general purpose entry and, additionally, does not teach permitting cross-access between at least one special purpose entry and at least one general purpose entry. Thus, Applicant respectfully submits that Cai does not anticipate independent claims 7, 13, 19, 25, and 30 of the presently claimed invention.

Claims 2-4, 6, 8-12, 14-16, 18, 20-24, 26-29, and 31-34 depend from and further limit independent claims 1, 7, 13, 19, 25, and 30, respectively. Thus, for at least the same reasons advanced above with respect to independent claims 1, 7, 13, 19, 25, and 30, Applicant respectfully submits that Cai does not anticipate claims 2-4, 6, 8-12, 14-16, 18, 20-24, 26-29, and 31-34.

Claims 5, 17, 23, and 35-40 have been cancelled.

Therefore, Applicant respectfully requests withdrawal of the 35 U.S.C. 102(b) rejection of claims 1-40.

CONCLUSION

Applicant respectfully submits that all rejections have been overcome and that all pending claims are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 50-0221. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Cyndi M. Wheeler at (916) 356-5358.

Respectfully Submitted,

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